

# **EXHIBIT B**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE WESTERN DISTRICT OF MISSOURI  
3                   WESTERN DIVISION  
4  
5    TERRI YOLANDA LABLANCE,   )  
6                   Plaintiffs,   )  
7    vs.                         )  
8    MISSOURI DEPARTMENT OF   ) Case No. 4:19-cv-00693-BP  
9    CORRECTIONS AND CORIZON   )  
10   HEALTH,                     )  
11                   Defendants.   )  
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13                                 \*\*\*\*\*  
14                   VIDEOCONFERENCE DEPOSITION OF TAMMIE CHRISTOPHER  
15                   TAKEN ON BEHALF OF THE PLAINTIFF  
16                   NOVEMBER 4, 2020  
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<p style="text-align: center;">Page 1</p> <p>IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION</p> <p>TERRI YOLANDA LABLANCE, )                                 ) Plaintiffs,         ) vs.                         )                                 )</p> <p>MISSOURI DEPARTMENT OF )Case No. 4:19-cv-00693-BP CORRECTIONS AND CORIZON ) HEALTH,                         )                                 ) Defendants.                 )</p> <p>*****</p> <p>VIDEOCONFERENCE DEPOSITION OF TAMMIE CHRISTOPHER TAKEN ON BEHALF OF THE PLAINTIFF NOVEMBER 4, 2020 *****</p>	<p style="text-align: right;">Page 3</p> <p>A P P E A R A N C E S</p> <p>For the Plaintiffs: Mr. Ivan Nugent Krigel &amp; Krigel, P.C. 4520 Main Street, Suite 700 Kansas City, MO 64111 tel: (816)756-5800</p> <p>For Defendant Corizon: Mr. Michael L. Matula Ogletree Deakins 4520 Main Street, Suite 400 Kansas City, Missouri 64111 tel: (816)471-1301</p> <p>For Department of Corrections: Ms. Rachel Jag Assistant Attorney General 615 E. 13th Street, Suite 401 Kansas City, Missouri 64106 tel: (816)889-5000</p> <p>Also Present on Zoom: Jenny Meehan</p> <p>Court Reporter: Joann Renee Richardson Alaris Litigation Services 711 North Eleventh Street St. Louis, MO 63101 314) 644-2191 1-800-280-3376</p>												
<p style="text-align: center;">Page 2</p> <p>THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION</p> <p>TERRI YOLANDA LABLANCE, )                                 ) Plaintiff,                 ) vs.                         )                                 )</p> <p>) Case# 4:19-cv-00693-BP MISSOURI DEPARTMENT OF ) CORRECTIONS AND CORIZON ) HEALTH,                         )                                 ) Defendants.                 )</p> <p>VIDEOCONFERENCE DEPOSITION OF TAMMIE CHRISTOPHER, produced, sworn and examined on November 4, 2020, between the hours of 8:30 a.m. and 11:20 a.m. of that day, via videoconference, before Joann Renee Richardson, a Certified Court Reporter within and for the State of Missouri, in a certain cause now pending in the United States District Court - Western District, wherein Terri Yolanda LaBlance is the Plaintiff and Missouri Department of Corrections and Corizon Health are the Defendants; taken on behalf of the Plaintiff.</p> <p>*****</p>	<p style="text-align: right;">Page 4</p> <p>I N D E X</p> <table border="0"> <tr> <td>EXAMINATION BY:</td> <td>PAGE:</td> </tr> <tr> <td>BY MR. NUGENT</td> <td>7</td> </tr> <tr> <td colspan="2">*****</td> </tr> </table> <p>E X H I B I T S</p> <table border="0"> <tr> <td>EXHIBIT NOS:</td> <td>PAGE:</td> </tr> <tr> <td>43 - Auditing Log</td> <td>30</td> </tr> <tr> <td>45 - Corrective Action Form Tammie Christopher</td> <td>62</td> </tr> </table> <p>(Exhibits retained by counsel, not attached.)</p>	EXAMINATION BY:	PAGE:	BY MR. NUGENT	7	*****		EXHIBIT NOS:	PAGE:	43 - Auditing Log	30	45 - Corrective Action Form Tammie Christopher	62
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<p style="text-align: right;">Page 5</p> <p>1 IT IS HEREBY STIPULATED AND AGREED, by and 2 between counsel for the PLAINTIFF and counsel for the 3 DEFENDANTS that this deposition may be taken in 4 shorthand by Joann Renee Richardson, Certified Court 5 Reporter, and afterwards transcribed into typewriting; 6 and the signature of the witness is expressly reserved. 7 * * * * *</p> <p>8 MR. VIDEOGRAPHER: We are on the record. 9 Today's date is November 4, 2020, and the time is 10 8:47 a.m. This is the video-recorded deposition of 11 Tammie Christopher in the matter of Terri Yolanda 12 LeBlance vs. the Missouri Department of Corrections and 13 Corizon Health, Case No. 4:19cv00693 in the United 14 States Court for Western District of Missouri, Western 15 Division. This deposition is being held via WebEx video 16 conference. 17 The reporter's name is Joann Richardson. My 18 name is Chris Chandler. I'm the legal videographer. 19 And we are with Alaris Litigation Services. 20 Today's deposition will be held via WebEx 21 with the court reporter not in the room with the 22 deponent. If all attorneys would now introduce 23 themselves and the parties that they represent and 24 stipulate to those terms, the court reporter will swear 25 in the witness and we may proceed.</p>	<p style="text-align: right;">Page 7</p> <p>1 MS. MEEHAN: Yes, I can. 2 MR. VIDEOGRAPHER: Are we going to go off 3 the record while she does that? 4 MR. MATULA: Yeah. 5 MR. VIDEOGRAPHER: Is that okay, Mr. Nugent? 6 MR. NUGENT: Sorry. Yes. 7 MR. VIDEOGRAPHER: Going off the record. 8 The time is 8:49 a.m. 9 (Off the record.) 10 _____ 11 (Back on the record.) 12 MR. VIDEOGRAPHER: We are back on the 13 record. The time is 8:59 a.m. 14 MS. JAG: This is Rachel Jag. I am 15 representing the Department of Corrections and I 16 stipulate that this deposition is being taken by WebEx. 17 TAMMIE CHRISTOPHER, 18 being first duly sworn, produced and examined, testified 19 as follows: 20 EXAMINATION 21 QUESTIONS BY MR. NUGENT: 22 <b>Q. Good morning, Tammie. My name is Ivan Nugent</b> 23 <b>and I represent the Plaintiff, Terri LaBlance, in a</b> 24 <b>case in which she has sued Corizon Health and the</b> 25 <b>Department of Corrections for various allegations</b></p>
<p style="text-align: right;">Page 6</p> <p>1 MR. NUGENT: Good morning. Ivan Nugent on 2 behalf of the Plaintiff, Terri LaBlance, and we 3 stipulate to this deposition happening via WebEx. 4 MR. MATULA: Mike Matula on behalf of 5 Corizon Health. I also stipulate the deposition 6 proceeding by WebEx. I did have one logistical question 7 here, now that I'm fully logged in and looking at the 8 screen. I just want to make sure we had a record that 9 Jenny Meehan is attending as the Corizon corporate 10 representative. They've got the one computer there, but 11 I wanted to get a record of everyone who is there. 12 MR. NUGENT: Hey, Mike, that raises somewhat 13 of an issue for me because I can't see Jenny. 14 MS. MEEHAN: We can sit closer. 15 MR. MATULA: Jenny, is there a -- you don't 16 have another device or something you can separately log 17 in, even though you guys are together, so that we could 18 have your own screen or your own window? 19 MS. MEEHAN: I have my cell phone. I can 20 log in through that. 21 MR. MATULA: Would you mind doing that? 22 It'd just be a little bit easier and probably more 23 appropriate just to have the frame on Tammie. Hopefully 24 you've got a charger or something to keep yourself 25 juiced through the day. Could you do that?</p>	<p style="text-align: right;">Page 8</p> <p>1 <b>related to her employment. We're here to take your</b> 2 <b>deposition today in that case. We are all virtual.</b> 3 <b>I believe that you and Jenny Meehan are in the same</b> 4 <b>room; is that accurate?</b> 5 A. Yes. 6 <b>Q. And do you understand that you are present</b> 7 <b>today to give testimony in the Terri LaBlance vs.</b> 8 <b>Corizon, et al case?</b> 9 A. Yes. 10 <b>Q. I'm going to go over a few sort of</b> 11 <b>housekeeping things before I dive into the questions</b> 12 <b>I have. First is, if you need a break, will you let</b> 13 <b>me know?</b> 14 A. Sure. 15 <b>Q. And, secondly, if you don't understand one of</b> 16 <b>my questions, will you let me know?</b> 17 A. Yes. 18 <b>Q. Will you also agree to answer questions on</b> 19 <b>your own accord and not with the assistance of Jenny</b> 20 <b>Meehan?</b> 21 A. Yes. 22 <b>Q. And then lastly, you've been sworn in. Do you</b> 23 <b>understand that you're under oath to tell the truth?</b> 24 A. Yes. 25 <b>Q. Will you, in fact, tell the truth today?</b></p>

2 (Pages 5 to 8)

<p style="text-align: right;">Page 9</p> <p>1 A. Yes.</p> <p>2 <b>Q. All right. Have you ever had your deposition</b></p> <p>3 <b>taken before?</b></p> <p>4 A. No.</p> <p>5 <b>Q. What's going to happen is, I'm going to ask</b></p> <p>6 <b>you a bunch of questions. I'm hoping that you'll</b></p> <p>7 <b>answer them. And then there may be times throughout</b></p> <p>8 <b>the day where your attorney, Mr. Mike Matula, may</b></p> <p>9 <b>interject and he will have, you know, something to</b></p> <p>10 <b>say. He'll say it on the record. And then either</b></p> <p>11 <b>he or I will instruct you to answer.</b></p> <p>12 <b>If he instructs you not to answer, we may have</b></p> <p>13 <b>additional conversations about that. But I just</b></p> <p>14 <b>want to make sure you understand the logistics of</b></p> <p>15 <b>how this goes?</b></p> <p>16 <b>In addition, there is a court reporter who is</b></p> <p>17 <b>recording everything that's being said as well as</b></p> <p>18 <b>the video itself is being recorded. Do you</b></p> <p>19 <b>understand all of that?</b></p> <p>20 A. Yes.</p> <p>21 <b>Q. All right. I do have some documents to show</b></p> <p>22 <b>you at some point. There is a feature here that</b></p> <p>23 <b>allows me to display them on the screen that you're</b></p> <p>24 <b>looking at. My ask is that you let me know if you</b></p> <p>25 <b>can't see those documents and also that if there's</b></p>	<p style="text-align: right;">Page 11</p> <p>1 A. A write-up that I had received in, I believe,</p> <p>2 2019, and there was a log showing access to a record</p> <p>3 on the MOCIS system.</p> <p>4 <b>Q. The log that you reviewed, did it have black</b></p> <p>5 <b>lines through it like it had been crossed out?</b></p> <p>6 A. I didn't notice, if so.</p> <p>7 <b>Q. I want to talk a little bit more about the</b></p> <p>8 <b>role that you're in now versus the director of</b></p> <p>9 <b>nursing role that you were in. Let's start with the</b></p> <p>10 <b>timeline. When did you become the director of</b></p> <p>11 <b>nursing?</b></p> <p>12 A. In July of 2018.</p> <p>13 <b>Q. Was that your start date with Corizon?</b></p> <p>14 A. My original start date was with CMS in 2006</p> <p>15 and then I left the company -- it turned into</p> <p>16 Corizon, though, when the companies merged. And</p> <p>17 then I left in 2017 for several months. And then I</p> <p>18 came back as DON in July of '18.</p> <p>19 <b>Q. So your most recent stint of employment</b></p> <p>20 <b>started in July of 2018; is that accurate?</b></p> <p>21 A. Yes.</p> <p>22 <b>Q. Okay. And you were hired directly to be the</b></p> <p>23 <b>director of nursing; is that accurate?</b></p> <p>24 A. Yes.</p> <p>25 <b>Q. What does CMS stand for?</b></p>
<p style="text-align: right;">Page 10</p> <p>1 <b>any confusion about what's there, that we just take</b></p> <p>2 <b>the time to get the documents squared away. Do you</b></p> <p>3 <b>understand that?</b></p> <p>4 A. I do.</p> <p>5 <b>Q. Okay. Who do you work for?</b></p> <p>6 A. Corizon Healthcare.</p> <p>7 <b>Q. And what do you do for Corizon Healthcare?</b></p> <p>8 A. I'm a staff nurse, a registered nurse.</p> <p>9 <b>Q. Is your title staff nurse?</b></p> <p>10 A. Yes. I used to be director of nursing, but</p> <p>11 then I went to PRN and now I'm a staff nurse full</p> <p>12 time. Well, 36 hours a week.</p> <p>13 <b>Q. Okay. Let me ask you this first. What did</b></p> <p>14 <b>you do to prepare for today's deposition?</b></p> <p>15 A. Well, I had a discussion yesterday with the</p> <p>16 attorneys from Ogletree Deakins.</p> <p>17 <b>MR. NUGENT: To clarify, I believe that</b></p> <p>18 <b>Ms. Christopher said she had conversations with</b></p> <p>19 <b>attorneys from Ogletree Deakins.</b></p> <p>20 <b>Q. (By Mr. Nugent) Tammie, I don't want you to</b></p> <p>21 <b>tell me anything that you and your attorneys talked</b></p> <p>22 <b>about. What I do want to know, though, is, did you</b></p> <p>23 <b>review any documents in preparing for today?</b></p> <p>24 A. Yes.</p> <p>25 <b>Q. Okay. What documents did you look at?</b></p>	<p style="text-align: right;">Page 12</p> <p>1 A. Correctional Medical Services.</p> <p>2 <b>Q. And is that a previous name of Corizon or is</b></p> <p>3 <b>that a different company altogether?</b></p> <p>4 A. I believe that CMS merged with another company</p> <p>5 and formed Corizon Health at some point years ago.</p> <p>6 I don't remember exactly when or what other company</p> <p>7 it merged with.</p> <p>8 <b>Q. Okay. And when did you stop being the</b></p> <p>9 <b>director of nursing?</b></p> <p>10 A. July of 2019.</p> <p>11 <b>Q. And why did you stop being the director of</b></p> <p>12 <b>nursing?</b></p> <p>13 A. The stress with management. I went to work at</p> <p>14 a local hospital for a while and stayed PRN with</p> <p>15 Corizon.</p> <p>16 <b>Q. Okay. Are you still employed by Corizon now?</b></p> <p>17 A. Yes.</p> <p>18 <b>Q. And are you PRN status now?</b></p> <p>19 A. No. I'm actually 36 hours a week every week</p> <p>20 now.</p> <p>21 <b>Q. And your title, I believe, is staff nurse?</b></p> <p>22 A. Registered nurse, yeah.</p> <p>23 <b>Q. Okay. And so in July of '19 you stepped down</b></p> <p>24 <b>as the director of nursing. Did you immediately go</b></p> <p>25 <b>into PRN status?</b></p>

3 (Pages 9 to 12)

<p style="text-align: right;">Page 13</p> <p>1 A. I did.</p> <p>2 <b>Q. And what hospital did you then go work for?</b></p> <p>3 A. Hedrick Medical Center in Chillicothe.</p> <p>4 <b>Q. Can you repeat that?</b></p> <p>5 A. Hedrick Medical Center. I started there in --</p> <p>6 I believe it was August.</p> <p>7 <b>Q. Okay. And can you spell -- is it Hedrick?</b></p> <p>8 A. H-E-D-R-I-C-K Medical Center. It's part of</p> <p>9 the Saint Luke's Health System.</p> <p>10 <b>Q. Did anyone from Corizon ask you to step down</b></p> <p>11 <b>as director of nursing?</b></p> <p>12 A. No.</p> <p>13 <b>Q. I believe that you were reprimanded in March</b></p> <p>14 <b>of 2019. Did your reprimand have anything to do</b></p> <p>15 <b>with your decision to step down as director of</b></p> <p>16 <b>nursing?</b></p> <p>17 A. No.</p> <p>18 <b>Q. When you were hired as the director of nursing</b></p> <p>19 <b>in July of 2018, did you receive any training on how</b></p> <p>20 <b>to supervise employees?</b></p> <p>21 A. There was DON training that I attended and</p> <p>22 that's where we got our training as far as</p> <p>23 supervisory, along with guidance from Jenny and Tara</p> <p>24 Taylor.</p> <p>25 <b>Q. All right. And when you refer to DON, is that</b></p>	<p style="text-align: right;">Page 15</p> <p>1 <b>staff nurse or director of nursing while employed</b></p> <p>2 <b>with Corizon Health?</b></p> <p>3 A. When I started in 2006, I was a GPN and I was</p> <p>4 an LPN. But as far as any other job capacity</p> <p>5 besides a staff nurse, no. Just staff nurse and</p> <p>6 DON.</p> <p>7 <b>Q. All right. What is a GPN?</b></p> <p>8 A. Graduate practical nurse.</p> <p>9 <b>Q. And what is an LPN?</b></p> <p>10 A. Licensed practical nurse.</p> <p>11 <b>Q. Ms. Christopher, are you married?</b></p> <p>12 A. Yes.</p> <p>13 <b>Q. What's your spouse's name?</b></p> <p>14 A. Ashton Christopher.</p> <p>15 <b>Q. And where does he work?</b></p> <p>16 A. He works at Chillicothe Correctional Center.</p> <p>17 <b>Q. How long has he worked there?</b></p> <p>18 A. Since 2006.</p> <p>19 <b>Q. And do you know what his title is?</b></p> <p>20 A. Case manager II.</p> <p>21 <b>Q. And do you know what that means? Have you and</b></p> <p>22 <b>he talked about what his role is at Chillicothe</b></p> <p>23 <b>Correctional Center?</b></p> <p>24 A. I don't fully understand it. I know he was in</p> <p>25 segregation and now he's over work release, but I</p>
<p style="text-align: right;">Page 14</p> <p>1 <b>the acronym for director of nursing?</b></p> <p>2 A. Yes.</p> <p>3 <b>Q. Can you tell me what the training consisted of</b></p> <p>4 <b>for DON?</b></p> <p>5 A. I can't remember everything, honestly. It was</p> <p>6 a few days. It was different things about CQI,</p> <p>7 continuous quality improvement. It was different</p> <p>8 things, like how to do CQI. Just different</p> <p>9 requirements of the job. Honestly, it's been so</p> <p>10 long I can't remember everything. But, yeah, just</p> <p>11 different responsibilities.</p> <p>12 <b>Q. I believe you said CQI. And does that stand</b></p> <p>13 <b>for continuous quality improvement?</b></p> <p>14 A. Yes.</p> <p>15 <b>Q. Okay. Do you recall whether there was any</b></p> <p>16 <b>training in how to discipline employees?</b></p> <p>17 A. I don't recall specifically.</p> <p>18 <b>Q. Was there any training on how to conduct</b></p> <p>19 <b>investigations into complaints made by employees?</b></p> <p>20 A. Not that I remember. Just to contact human</p> <p>21 resources, go through our chain of command.</p> <p>22 <b>Q. All right. Can you tell me what your highest</b></p> <p>23 <b>level of education is?</b></p> <p>24 A. Right now, associate's degree.</p> <p>25 <b>Q. And have you held any other titles other than</b></p>	<p style="text-align: right;">Page 16</p> <p>1 don't know what he does day to day.</p> <p>2 <b>Q. Okay. And do you know whether he was</b></p> <p>3 <b>reprimanded shortly after you were with regards to</b></p> <p>4 <b>his employment with the DOC?</b></p> <p>5 A. He was.</p> <p>6 <b>Q. And do you know what he was reprimanded for?</b></p> <p>7 A. Accessing a face sheet, I believe. I didn't</p> <p>8 see the paper, but --</p> <p>9 <b>Q. And do you know whose face sheet he accessed?</b></p> <p>10 A. I believe it was Terri's.</p> <p>11 <b>Q. While you were the director of nursing, was</b></p> <p>12 <b>the supervision of other nurses a part of your job</b></p> <p>13 <b>requirement or job duties?</b></p> <p>14 A. Of nurses, yes, RNs and LPNs.</p> <p>15 <b>Q. Can you say the last part again?</b></p> <p>16 A. Yes. I supervise the RNs and LPNs.</p> <p>17 <b>Q. All right. And in your supervision of the</b></p> <p>18 <b>registered nurses and the LPN nurses, did you</b></p> <p>19 <b>provide personnel reviews of those nurses?</b></p> <p>20 A. As far as their, like, yearly -- what do you</p> <p>21 mean by personnel review?</p> <p>22 <b>Q. Their yearly reviews.</b></p> <p>23 A. Sterling and I both did. She usually would do</p> <p>24 the most part of it, but I would go over it with</p> <p>25 them.</p>

4 (Pages 13 to 16)

<p style="text-align: right;">Page 17</p> <p>1 Q. Were you also -- or was a part of your job</p> <p>2 duty to reprimand the nurses that you supervised, if</p> <p>3 warranted?</p> <p>4 A. Yes.</p> <p>5 Q. What are the services that Corizon provides at</p> <p>6 Chillicothe?</p> <p>7 A. Provide healthcare to the offender population.</p> <p>8 Q. Okay. And with regards to the healthcare,</p> <p>9 does that include medical care?</p> <p>10 A. Yes.</p> <p>11 Q. Does it include dental care?</p> <p>12 A. Yes.</p> <p>13 Q. And does it include mental healthcare?</p> <p>14 A. They're in a separate building. But, yes,</p> <p>15 Corizon provides mental healthcare as well.</p> <p>16 Q. Okay. Are there any other types of medical</p> <p>17 services that Corizon provides at Chillicothe?</p> <p>18 A. We have optometry come in sometimes. We do</p> <p>19 X-ray and lab, but that's part of medical care. So</p> <p>20 I'm not sure.</p> <p>21 Q. You mentioned that mental health is in a</p> <p>22 different building. What is in the building that</p> <p>23 houses the dental and medical care?</p> <p>24 A. Everything except mental health.</p> <p>25 Q. Okay. Are the dental providers and the</p>	<p style="text-align: right;">Page 19</p> <p>1 medical.</p> <p>2 Q. All right. So the portion of the facility</p> <p>3 where an inmate might go to receive dental care or</p> <p>4 to receive medical care is the same portion of the</p> <p>5 facility?</p> <p>6 A. Yes.</p> <p>7 Q. When you were the director of nursing from</p> <p>8 July of '18 to July of '19, were you responsible for</p> <p>9 supervising Terri LaBlance?</p> <p>10 A. No.</p> <p>11 Q. Okay. Did you report to Terri?</p> <p>12 A. No. My immediate supervisor was Sterling</p> <p>13 Ream.</p> <p>14 Q. And what was her title while you were the</p> <p>15 director of nursing?</p> <p>16 A. Health services administrator.</p> <p>17 Q. Do you know who Terri LaBlance reported to?</p> <p>18 A. I believe clinically it would have been the</p> <p>19 collaborating physician.</p> <p>20 Q. Okay. Was your position as director of</p> <p>21 nursing, did you view that as a management position?</p> <p>22 A. Yes. It's considered site management.</p> <p>23 Q. When you started July -- when you started in</p> <p>24 July of 2018, did you receive the harassment policy?</p> <p>25 A. I'm sure I did.</p>
<p style="text-align: right;">Page 18</p> <p>1 medical providers in the same portion of the</p> <p>2 facility there in Chillicothe?</p> <p>3 A. Yes.</p> <p>4 Q. So to say it a different way, do you see</p> <p>5 regularly the dental -- the folks that provide</p> <p>6 dental care to the inmates?</p> <p>7 A. They work in the same building, yes.</p> <p>8 Q. Okay. What about the same wing or hallway of</p> <p>9 the building?</p> <p>10 A. Yes. They are in the back of the -- we call</p> <p>11 it the clinical side of the hallway.</p> <p>12 Q. So all of the Corizon employees who provide</p> <p>13 medical care, do they all report to the same wing</p> <p>14 and do their jobs in the same portion of the</p> <p>15 facility?</p> <p>16 A. I mean, they may have separate offices but in</p> <p>17 the same building.</p> <p>18 Q. Okay.</p> <p>19 A. We do have a nurse that will go to ad seg or,</p> <p>20 you know, things like that, but they all are based</p> <p>21 out of that building.</p> <p>22 Q. When you say you have a nurse that'll go to</p> <p>23 ad seg, tell me what ad seg is.</p> <p>24 A. Segregation. It's a different housing unit</p> <p>25 where the offenders aren't able to come up to</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Have you ever had to do an investigation into</p> <p>2 workplace harassment or discrimination?</p> <p>3 A. No. I'd just report it to an immediate</p> <p>4 supervisor if there was any concerns.</p> <p>5 Q. Okay. So if a concern -- let me ask a</p> <p>6 different way. Have concerns about workplace</p> <p>7 harassment or discrimination been brought to you?</p> <p>8 A. Not that I recall, no.</p> <p>9 Q. I want to go back to the logistics of the</p> <p>10 medical center. Do you interact with the dental</p> <p>11 staff?</p> <p>12 A. When I would do rounds. If I would walk</p> <p>13 around the building in the morning, I would pop in</p> <p>14 and say hi and see how it was going. Otherwise,</p> <p>15 they may come into our office and visit or talk.</p> <p>16 Q. Is that pretty common?</p> <p>17 A. I mean, yeah. People are in and out all day</p> <p>18 long.</p> <p>19 Q. Okay. Do you know Kelley Chapman?</p> <p>20 A. Doesn't ring a bell.</p> <p>21 Q. I want to talk a little bit about Terri</p> <p>22 LaBlance. During your time as director of nursing,</p> <p>23 were there any other African Americans employed by</p> <p>24 Corizon? And let me clarify the question. Were</p> <p>25 there any other African Americans employed by</p>

5 (Pages 17 to 20)



<p style="text-align: right;">Page 21</p> <p>1 <b>Corizon at the Chillicothe facility?</b></p> <p>2 A. Not that I recall.</p> <p>3 <b>Q. Okay. Are there any African Americans that</b></p> <p>4 <b>work for Corizon at the Chillicothe facility now?</b></p> <p>5 A. I don't believe so.</p> <p>6 <b>Q. I want to ask you if you are familiar with a</b></p> <p>7 <b>few events in, I believe, August or September of</b></p> <p>8 <b>2017. There was a racial slur used by an employee</b></p> <p>9 <b>of Corizon in a conversation with Ms. LaBlance. Are</b></p> <p>10 <b>you familiar with that set of facts as I've</b></p> <p>11 <b>explained them?</b></p> <p>12 A. I heard about it second or thirdhand. I</p> <p>13 wasn't there for -- I was at work that day, I</p> <p>14 believe, but I didn't witness it.</p> <p>15 <b>Q. Okay. And that would have been in 2017. Were</b></p> <p>16 <b>you employed by Corizon in 2017?</b></p> <p>17 A. I believe I didn't leave until September of</p> <p>18 '17.</p> <p>19 <b>Q. Do you recall whether you were interviewed by</b></p> <p>20 <b>anyone from human resources about the racial slur</b></p> <p>21 <b>that I just referenced?</b></p> <p>22 A. I wasn't, but I didn't witness it.</p> <p>23 <b>Q. Do you recall who told you about the racial</b></p> <p>24 <b>slur?</b></p> <p>25 A. I don't. I think I heard it in the lunchroom</p>	<p style="text-align: right;">Page 23</p> <p>1 like, personally.</p> <p>2 <b>Q. You know of him; is that right?</b></p> <p>3 A. Yes, I know of him.</p> <p>4 <b>Q. Okay. Do you know of a Nicholas Koenig?</b></p> <p>5 A. Yes.</p> <p>6 <b>Q. What about April Wolf?</b></p> <p>7 A. I believe she's an officer as well.</p> <p>8 <b>Q. Dustin Lybarger?</b></p> <p>9 A. He's an officer as well.</p> <p>10 <b>Q. Bradley Richards?</b></p> <p>11 A. I think he's a correctional officer as well.</p> <p>12 <b>Q. Jeff Parque? (Phonetic on name.)</b></p> <p>13 A. Yes. I think he's a correctional officer as</p> <p>14 well.</p> <p>15 <b>Q. Mindy Rhodes?</b></p> <p>16 A. Yes. She's a correctional officer.</p> <p>17 <b>Q. Okay. And Phillip Bower?</b></p> <p>18 A. Yes. I believe he is or was an officer.</p> <p>19 <b>Q. Of all of those names, are any of them --</b></p> <p>20 <b>would you consider any of them friends?</b></p> <p>21 A. I mean, nobody I talk to outside of work.</p> <p>22 Might have been in passing.</p> <p>23 <b>Q. So none of those names are individuals that</b></p> <p>24 <b>you socialize with outside of work?</b></p> <p>25 A. I believe Parque was in a fantasy football</p>
<p style="text-align: right;">Page 22</p> <p>1 because someone had reported it.</p> <p>2 <b>Q. When you say you heard it in the lunchroom,</b></p> <p>3 <b>were there other people talking about what had</b></p> <p>4 <b>happened?</b></p> <p>5 A. Somebody told me in there. I don't remember.</p> <p>6 <b>Q. What was your response?</b></p> <p>7 A. I was shocked.</p> <p>8 <b>Q. Did you do anything after learning about the</b></p> <p>9 <b>slur?</b></p> <p>10 A. I know that Sterling reported it as soon as</p> <p>11 she heard about it, so I knew that it was taken care</p> <p>12 of. And I don't believe the other employee came</p> <p>13 back after that day. I believe she was terminated,</p> <p>14 but I'm not sure. I wasn't in a management position</p> <p>15 at that time to know exactly what happened.</p> <p>16 <b>Q. All right. In your answer did you identify a</b></p> <p>17 <b>name, someone that you talked to?</b></p> <p>18 A. Sterling Ream reported it to management. She</p> <p>19 was the management at that time.</p> <p>20 <b>Q. All right. I'm going to ask you if you know a</b></p> <p>21 <b>list of names. And if you do, I'm going to ask you</b></p> <p>22 <b>a few follow-ups with regards to the names. Okay?</b></p> <p>23 A. Okay.</p> <p>24 <b>Q. Do you know Brandon Doss?</b></p> <p>25 A. I think he's an officer, but I don't know him,</p>	<p style="text-align: right;">Page 24</p> <p>1 league I was in at some point, but not like close</p> <p>2 friends, no.</p> <p>3 <b>Q. Earlier you referenced a software system and I</b></p> <p>4 <b>believe you called it MOCIS. Is MOCIS M-O-C-I-S?</b></p> <p>5 A. Yes.</p> <p>6 <b>Q. Okay. Is that an acronym?</b></p> <p>7 A. I'm sure it is. I don't know exactly what it</p> <p>8 stands for.</p> <p>9 <b>Q. Do you know what records are housed in the</b></p> <p>10 <b>MOCIS software system?</b></p> <p>11 A. I don't know all of them. I know the ones</p> <p>12 that we use in medical, but I don't know what</p> <p>13 anybody else would use.</p> <p>14 <b>Q. All right. What do you all use -- in the</b></p> <p>15 <b>medical department or, you know, in your day-to-day</b></p> <p>16 <b>duties, what do you use the MOCIS system for?</b></p> <p>17 A. To document healthcare, look up information.</p> <p>18 <b>Q. Do you know if all of the records in that</b></p> <p>19 <b>system are HIPAA protected?</b></p> <p>20 MR. MATULA: Object to the form of the</p> <p>21 question. Go ahead, Tammie.</p> <p>22 A. I believe parts of it are. The health record.</p> <p>23 <b>Q. (By Mr. Nugent) If I understand your</b></p> <p>24 <b>testimony, parts of the records in the MOCIS system</b></p> <p>25 <b>that you use are protected and parts are not; is</b></p>

6 (Pages 21 to 24)



<p style="text-align: right;">Page 25</p> <p>1 that accurate?</p> <p>2 A. In the MOCIS system, yeah, I believe so.</p> <p>3 Q. Okay. Do you know one way or the other?</p> <p>4 A. I mean, anything health-record-related is</p> <p>5 protected by HIPAA, yes.</p> <p>6 Q. Can you tell me what the criteria is for a</p> <p>7 health record?</p> <p>8 A. A patient's record, medication, demographics.</p> <p>9 I can't give you the all-inclusive list off the top</p> <p>10 of my head. I'm sorry.</p> <p>11 Q. You did mention demographics. Can you tell me</p> <p>12 what you mean by demographics?</p> <p>13 A. I would say, like, anything that's not public</p> <p>14 record maybe, like a social security number or</p> <p>15 anything like that, but I don't believe that's part</p> <p>16 of it. I mean, the healthcare part of MOCIS, I</p> <p>17 can't tell you off the top of my head.</p> <p>18 Q. When you started with Corizon in July of 2018,</p> <p>19 did you receive training on how to use the MOCIS</p> <p>20 system?</p> <p>21 A. I had previously received training when I</p> <p>22 started in my previous stint of employment.</p> <p>23 Q. Okay. So in July of 2018, when you became the</p> <p>24 director of nursing, is it fair to say that you knew</p> <p>25 how to use the MOCIS system?</p>	<p style="text-align: right;">Page 27</p> <p>1 different way. You accessed Terri LaBlance's</p> <p>2 records, right?</p> <p>3 A. I pulled up her face sheet.</p> <p>4 Q. Okay. And she was not -- Terri LaBlance was</p> <p>5 not a patient of yours, right?</p> <p>6 A. No.</p> <p>7 Q. You knew that Ms. LaBlance had been a patient</p> <p>8 of the Department of Corrections at some point; is</p> <p>9 that right?</p> <p>10 A. Yes.</p> <p>11 Q. All right. When was the first time you looked</p> <p>12 at Ms. LaBlance's face sheet?</p> <p>13 A. I don't remember the date, but somebody had</p> <p>14 brought in a Post-it note with a number on it and</p> <p>15 said, "Look this up."</p> <p>16 Q. Who was that?</p> <p>17 A. I was trying to think of that. I'm not 100</p> <p>18 percent sure. I think it may have been either</p> <p>19 Dr. Epperson or Val Kirby.</p> <p>20 Q. So if I understand you right, either</p> <p>21 Dr. Epperson or Val Kirby brought a Post-it note to</p> <p>22 you with numbers written on it and said, "Look this</p> <p>23 up."</p> <p>24 A. I don't know if that's the exact words because</p> <p>25 it's been a while, but that's the gist of it, yes.</p>
<p style="text-align: right;">Page 26</p> <p>1 A. Yes.</p> <p>2 Q. Do you use the MOCIS system daily?</p> <p>3 A. Yes, at work.</p> <p>4 Q. Right. And then can you access the MOCIS</p> <p>5 system outside of work?</p> <p>6 A. No.</p> <p>7 Q. Why is that?</p> <p>8 A. I believe it's just on a as-needed basis for</p> <p>9 people. I'm not sure.</p> <p>10 Q. Have you tried to access it outside of work?</p> <p>11 A. No.</p> <p>12 Q. When you are accessing the MOCIS system in</p> <p>13 your day-to-day job, are the records that you are</p> <p>14 accessing records of patients that you're actively</p> <p>15 treating?</p> <p>16 A. Yes.</p> <p>17 Q. Contained within that software, if a patient</p> <p>18 was treated, let's say, ten years ago, is there</p> <p>19 information still present?</p> <p>20 MR. MATULA: Object to the form of the</p> <p>21 question. Go ahead, Tammie.</p> <p>22 A. I would assume it would be present. I'm not</p> <p>23 sure how long the health records are retained in the</p> <p>24 state.</p> <p>25 Q. (By Mr. Nugent) Okay. Let me ask it a</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. All right. How confident are you that it was</p> <p>2 Val Kirby or Dr. Epperson?</p> <p>3 A. I can't say 100 percent. It's been -- I think</p> <p>4 it was them, but I can't say -- I just don't</p> <p>5 remember for sure enough to say 100 percent that it</p> <p>6 was one of them.</p> <p>7 Q. Okay. So is it also safe to say you don't</p> <p>8 know who brought the Post-it note with the numbers</p> <p>9 on it?</p> <p>10 A. I don't know for sure, no.</p> <p>11 Q. And then, lastly, it could be somebody else</p> <p>12 other than Dr. Epperson or Val Kirby?</p> <p>13 A. It could have been.</p> <p>14 Q. I'm going to read a list of names and I want</p> <p>15 you tell me if you think it might be one of these</p> <p>16 people. Okay?</p> <p>17 A. Okay.</p> <p>18 Q. Do you think that it was Deborah Ritter?</p> <p>19 A. I don't believe so.</p> <p>20 Q. Judy Harkins?</p> <p>21 A. I don't believe so.</p> <p>22 Q. Megan Rex?</p> <p>23 A. I don't believe so.</p> <p>24 Q. Jessica Frizzell?</p> <p>25 A. I don't believe so.</p>

7 (Pages 25 to 28)

<p style="text-align: right;">Page 29</p> <p>1 <b>Q. Brandon Doss?</b></p> <p>2 A. No.</p> <p>3 <b>Q. Lori Switzer?</b></p> <p>4 A. I don't believe so.</p> <p>5 <b>Q. Sterling Ream?</b></p> <p>6 A. No.</p> <p>7 <b>Q. Brandy Baker?</b></p> <p>8 A. No.</p> <p>9 <b>Q. Shannon Burris?</b></p> <p>10 A. No.</p> <p>11 <b>Q. Teresa Hamilton?</b></p> <p>12 A. I don't believe so.</p> <p>13 <b>Q. Tabitha Johnson?</b></p> <p>14 A. I don't believe so.</p> <p>15 <b>Q. Rachel Rempel?</b></p> <p>16 A. No.</p> <p>17 <b>Q. Carol Holloway?</b></p> <p>18 A. No.</p> <p>19 <b>Q. Alex Spencer?</b></p> <p>20 A. No.</p> <p>21 <b>Q. Megan Meyer?</b></p> <p>22 A. No.</p> <p>23 <b>Q. Rachel Stuver?</b></p> <p>24 A. No.</p> <p>25 <b>Q. All right. The person who brought the sticky</b></p>	<p style="text-align: right;">Page 31</p> <p>1 reviewing the Department of Corrections interrogatory</p> <p>2 responses -- I'm just simply referring to that. So if</p> <p>3 I'm stating it wrong, I guess we can clear that up</p> <p>4 later.</p> <p>5 MR. MATULA: It's not a major thing. I</p> <p>6 think there is some issue of the exact form. There's no</p> <p>7 dispute that the audit log history was provided. That's</p> <p>8 not the problem. I don't think it's been established</p> <p>9 exactly the manner it was done at the time. So other</p> <p>10 than that, go ahead.</p> <p>11 MR. NUGENT: Understood.</p> <p>12 <b>Q. (By Mr. Nugent) Ms. Christopher, I have zoomed</b></p> <p>13 <b>in and I want to make sure that you can see it</b></p> <p>14 <b>clearly. On my screen it looks clear, but if it's</b></p> <p>15 <b>not on yours, please tell me.</b></p> <p>16 A. I can see it.</p> <p>17 <b>Q. All right. And my mouse is at the entry that</b></p> <p>18 <b>has what appears to be your name or email address.</b></p> <p>19 <b>Do you see that?</b></p> <p>20 A. Yes.</p> <p>21 <b>Q. All right. Specifically, according to this</b></p> <p>22 <b>log, you accessed Ms. LaBlance's charting guide list</b></p> <p>23 <b>page on February 7, 2019 at 8:54 a.m. Do you see</b></p> <p>24 <b>that?</b></p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 30</p> <p>1 note with the number on it, do you believe that that</p> <p>2 person was a Corizon employee?</p> <p>3 A. Yes.</p> <p>4 <b>Q. Based on records that I have -- I'm just going</b></p> <p>5 <b>to pull them up. That might be the easiest way to</b></p> <p>6 <b>do this. Give me one second. Tammie, do you see a</b></p> <p>7 <b>document in front of you entitled Auditing Logs</b></p> <p>8 <b>Search Results?</b></p> <p>9 A. Yeah, I can see the title.</p> <p>10 <b>Q. Okay. And then at the bottom there's an</b></p> <p>11 <b>exhibit sticker that says Exhibit 43. Do you see</b></p> <p>12 <b>that?</b></p> <p>13 A. Yes.</p> <p>14 MR. NUGENT: I'm going to identify this real</p> <p>15 quick. I've submitted to the witness what I'm going to</p> <p>16 refer to as Deposition Exhibit 43. It is Bates-labeled</p> <p>17 MDOC1940 through 1943.</p> <p>18 <b>Q. (By Mr. Nugent) Ms. Christopher, this is a log</b></p> <p>19 <b>that was provided to me by the Department of</b></p> <p>20 <b>Corrections. I'll also represent to you that it was</b></p> <p>21 <b>provided to Corizon back in 2019. I want to --</b></p> <p>22 MR. MATULA: Ivan, I'm just going to object</p> <p>23 partially about -- that statement, I think, is slightly</p> <p>24 misstating the record. But go ahead.</p> <p>25 MR. NUGENT: Well, I believe that in</p>	<p style="text-align: right;">Page 32</p> <p>1 <b>Q. Any reason to dispute that?</b></p> <p>2 A. No.</p> <p>3 <b>Q. What information is on the charting guide list</b></p> <p>4 <b>page?</b></p> <p>5 A. We call it the "face page." It's basically</p> <p>6 just got name and number, a picture, date of birth.</p> <p>7 And then there's tabs that you can go into the</p> <p>8 health care record if you click on that.</p> <p>9 <b>Q. Let me ask the question again,</b></p> <p>10 <b>Ms. Christopher.</b></p> <p>11 A. Okay.</p> <p>12 <b>Q. I'm hoping that that will help the court</b></p> <p>13 <b>reporter capture your answer. I believe that the</b></p> <p>14 <b>question was, what information can be seen from the</b></p> <p>15 <b>charting guide list page?</b></p> <p>16 A. Name, number, a picture, date of birth, and</p> <p>17 then there's tabs that go into the health record.</p> <p>18 <b>Q. Ms. Christopher, in your opinion, is the</b></p> <p>19 <b>charting guide list page HIPAA information?</b></p> <p>20 A. In hindsight, yes.</p> <p>21 <b>Q. Okay. And when you say "in hindsight," what</b></p> <p>22 <b>do you mean?</b></p> <p>23 A. Well, when I pulled up the number, I really,</p> <p>24 honestly, just wasn't thinking. And then I received</p> <p>25 the write-up that you mentioned and I did see where</p>

<p style="text-align: right;">Page 33</p> <p>1 I should not have done that.</p> <p>2 <b>Q. Okay. When you say you saw the number and you</b></p> <p>3 <b>weren't thinking, did the number on the Post-it note</b></p> <p>4 <b>have a name attached to it?</b></p> <p>5 A. I don't remember.</p> <p>6 <b>Q. When you looked at the Post-it note, could you</b></p> <p>7 <b>identify just from the Post-it note who the record</b></p> <p>8 <b>was going to belong to?</b></p> <p>9 A. I don't remember if it had a name on it to</p> <p>10 identify it by looking at it.</p> <p>11 <b>Q. So after having the Post-it note, did you have</b></p> <p>12 <b>to go to the MOCIS record in order to identify who</b></p> <p>13 <b>the number belonged to?</b></p> <p>14 A. I don't remember if they told me who it was</p> <p>15 when they handed it to me or not, honestly.</p> <p>16 <b>Q. Okay. Safe to say, though, that after looking</b></p> <p>17 <b>at the record, you knew who it belonged to, right?</b></p> <p>18 A. Yeah. After looking at the face sheet, yes.</p> <p>19 <b>Q. After looking at the face sheet, what did you</b></p> <p>20 <b>do?</b></p> <p>21 A. I didn't go any further.</p> <p>22 <b>Q. I understand that. Let me make sure I</b></p> <p>23 <b>understand your question. When you say you didn't</b></p> <p>24 <b>go any further, are you saying you didn't go any</b></p> <p>25 <b>further with regards to the MOCIS software?</b></p>	<p style="text-align: right;">Page 35</p> <p>1 <b>Q. Okay. And is this the only time you've been</b></p> <p>2 <b>reprimanded?</b></p> <p>3 A. Yes, as far as I remember. As far as a</p> <p>4 write-up, yes.</p> <p>5 <b>Q. Outside of being in the room with Sterling</b></p> <p>6 <b>Ream and, I think, you said Dr. Epperson, were you</b></p> <p>7 <b>present during any other conversations about this</b></p> <p>8 <b>face sheet or Ms. LaBlance's records?</b></p> <p>9 A. Not that I recall, outside of the conversation</p> <p>10 in our office with Dr. Epperson and Val.</p> <p>11 <b>Q. Okay. And so I believe you said you and</b></p> <p>12 <b>Sterling Ream shared an office, right?</b></p> <p>13 A. Yes.</p> <p>14 <b>Q. Were both Dr. Epperson and Val Kirby in the</b></p> <p>15 <b>office during this conversation?</b></p> <p>16 A. I believe so, but I can't say 100 percent.</p> <p>17 People were in and out all the time.</p> <p>18 <b>Q. What percent would you say?</b></p> <p>19 A. I mean, it's hard to say. I know they were</p> <p>20 both in there for conversation about it at some</p> <p>21 point. I just don't know if it was exactly at that</p> <p>22 time.</p> <p>23 <b>Q. Okay. What was the tone of the conversation?</b></p> <p>24 <b>I understand you are saying you don't remember what</b></p> <p>25 <b>was said, but what was the tone of the conversation?</b></p>
<p style="text-align: right;">Page 34</p> <p>1 A. As far as, like, I didn't try to go any deeper</p> <p>2 into the record.</p> <p>3 <b>Q. Okay. After looking at the face sheet, did</b></p> <p>4 <b>you tell anyone that you looked at the face sheet?</b></p> <p>5 A. I believe Sterling Ream was in the room</p> <p>6 because we shared an office, so she knew.</p> <p>7 <b>Q. What did you say to Sterling?</b></p> <p>8 A. I don't remember what I said exactly because</p> <p>9 it's been a while.</p> <p>10 <b>Q. After closing -- I assume you closed out at</b></p> <p>11 <b>some point; is that right?</b></p> <p>12 A. Uh-huh.</p> <p>13 <b>Q. Yes?</b></p> <p>14 A. Yes.</p> <p>15 <b>Q. Sterling Ream was in the room with you, so</b></p> <p>16 <b>it's safe to say you and her had a conversation</b></p> <p>17 <b>about it?</b></p> <p>18 A. If we did, I don't remember what it was. I</p> <p>19 believe that either Dr. Epperson or Val was in the</p> <p>20 room and talking to her, but I'm not sure. It's</p> <p>21 been so long I can't remember the details.</p> <p>22 <b>Q. Well, I guess -- I understand that it's been</b></p> <p>23 <b>so long that you can't remember the details, but you</b></p> <p>24 <b>were reprimanded over this, right?</b></p> <p>25 A. Yes, later.</p>	<p style="text-align: right;">Page 36</p> <p>1 A. I just think -- I think it was shock, maybe,</p> <p>2 or surprise. I'm not sure. It's hard to say what</p> <p>3 someone's tone means.</p> <p>4 <b>Q. Well, was the conversation serious in nature?</b></p> <p>5 A. I mean, I would say Dr. Epperson, she was</p> <p>6 surprised that she didn't know because she was her</p> <p>7 collaborating physician. I remember that.</p> <p>8 <b>Q. Okay. You just mentioned surprised to know.</b></p> <p>9 <b>I would view that as sort of a tone, if you will, of</b></p> <p>10 <b>a conversation. Was there any other -- how else</b></p> <p>11 <b>would you describe the conversation?</b></p> <p>12 A. I can't really think of anything else to</p> <p>13 describe that conversation at this point. Just</p> <p>14 surprise.</p> <p>15 <b>Q. So just surprised? Was there any part of you</b></p> <p>16 <b>that felt like you needed to report this</b></p> <p>17 <b>conversation or what happened during the</b></p> <p>18 <b>conversation to anyone at Corizon?</b></p> <p>19 A. Well, my administrator already knew about it</p> <p>20 because she was in the room. So that's my chain of</p> <p>21 command.</p> <p>22 <b>Q. Okay. Did Sterling Ream tell you that she</b></p> <p>23 <b>reported the conversation to anyone?</b></p> <p>24 A. I didn't ask.</p> <p>25 <b>Q. So no?</b></p>

<p style="text-align: right;">Page 37</p> <p>1 A. She didn't tell me if she did, no, that I</p> <p>2 recall anyway.</p> <p>3 <b>Q. Outside of those in the office during this</b></p> <p>4 <b>conversation, which are Dr. Epperson, Val Kirby,</b></p> <p>5 <b>yourself, and Sterling Ream, do you know whether any</b></p> <p>6 <b>other Corizon employees knew about the face sheet?</b></p> <p>7 MR. MATULA: Object to the form of the</p> <p>8 question. Vague.</p> <p>9 <b>Q. (By Mr. Nugent) You can answer.</b></p> <p>10 A. Well, before I left my employment in 2017, I</p> <p>11 know people had talked about the fact that she had</p> <p>12 been in trouble before, but I don't remember anyone</p> <p>13 specifically mentioning that.</p> <p>14 <b>Q. Okay. I want to come back to that answer, but</b></p> <p>15 <b>I want to make sure that I wrap up my question. The</b></p> <p>16 <b>conversation you had in the office with Kirby,</b></p> <p>17 <b>Epperson, Ream, and yourself was in February of 2018</b></p> <p>18 <b>-- I'm sorry -- February of 2019, correct?</b></p> <p>19 A. I believe so, judging by that that was when it</p> <p>20 was pulled up.</p> <p>21 <b>Q. Okay. And so in and around the time of</b></p> <p>22 <b>February 2019, did you have any conversations with</b></p> <p>23 <b>anyone else at Corizon about Ms. LaBlance's face</b></p> <p>24 <b>sheet?</b></p> <p>25 A. Not that I recall.</p>	<p style="text-align: right;">Page 39</p> <p>1 how I heard about it. But I didn't really think</p> <p>2 much of it. I was busy.</p> <p>3 <b>Q. Okay. Was Ms. LaBlance an evening shift</b></p> <p>4 <b>nurse?</b></p> <p>5 A. She worked during the day, as far as I know,</p> <p>6 all the time.</p> <p>7 <b>Q. So when you were working evenings, you weren't</b></p> <p>8 <b>working with Ms. LaBlance; is that right?</b></p> <p>9 A. We might have crossed -- like I might have</p> <p>10 came in before she left, but I would stay late after</p> <p>11 she'd left.</p> <p>12 <b>Q. Okay. Do you know a Megan Meyer?</b></p> <p>13 A. Yes. She used to be our X-ray tech.</p> <p>14 <b>Q. And is she still employed with Corizon?</b></p> <p>15 A. No.</p> <p>16 <b>Q. Do you know Alex Spencer?</b></p> <p>17 A. Yes.</p> <p>18 <b>Q. What was Alex Spencer's title?</b></p> <p>19 A. She was an LPN. I don't remember when she got</p> <p>20 her RN, but she's an RN now.</p> <p>21 <b>Q. Is she still employed; do you know?</b></p> <p>22 A. No.</p> <p>23 <b>Q. You're familiar with the LPN and RN job</b></p> <p>24 <b>responsibilities; is that right?</b></p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 38</p> <p>1 <b>Q. Do you know one way or the other?</b></p> <p>2 A. I mean, I don't remember having any, no.</p> <p>3 <b>Q. Is it possible that you had any other</b></p> <p>4 <b>conversations?</b></p> <p>5 A. All I can see is if I did, I don't remember.</p> <p>6 I don't remember having any.</p> <p>7 <b>Q. Okay. You mentioned that prior to you leaving</b></p> <p>8 <b>in 2017 that there was talk of Ms. LaBlance having a</b></p> <p>9 <b>record. Remind me -- you left in September of 2017?</b></p> <p>10 A. Yes.</p> <p>11 <b>Q. And do you recall when Ms. LaBlance started at</b></p> <p>12 <b>Corizon?</b></p> <p>13 A. I don't remember exactly when she started. I</p> <p>14 was PRN at the time before I left and I worked a lot</p> <p>15 of evening shifts, so I didn't really see a lot of</p> <p>16 the staff as much because -- the dayshift staff.</p> <p>17 <b>Q. Okay. If I told you that Ms. LaBlance started</b></p> <p>18 <b>with Corizon in June of 2017, would you have any</b></p> <p>19 <b>reason to dispute or doubt that?</b></p> <p>20 A. I would say that sounds about right.</p> <p>21 <b>Q. Do you know who was discussing the fact that</b></p> <p>22 <b>Ms. LaBlance had a record in 2017?</b></p> <p>23 A. I don't remember. I think there was a</p> <p>24 conversation with a couple of nurses on evening</p> <p>25 shift and I don't remember who they were, but that's</p>	<p style="text-align: right;">Page 40</p> <p>1 <b>Q. Any reason why an LPN or an RN would access</b></p> <p>2 <b>the face sheet of Terri LaBlance?</b></p> <p>3 A. No, not if they weren't providing care.</p> <p>4 <b>Q. What about an X-ray tech, any reason why an</b></p> <p>5 <b>X-ray tech would access the face sheet of Terri</b></p> <p>6 <b>LaBlance?</b></p> <p>7 A. Not if she wasn't providing care, no.</p> <p>8 <b>Q. Okay. Are you familiar with Deborah Ritter?</b></p> <p>9 A. Yes.</p> <p>10 <b>Q. Do you know what her job title was?</b></p> <p>11 A. LPN.</p> <p>12 <b>Q. Do you know whether she's still employed with</b></p> <p>13 <b>Corizon?</b></p> <p>14 A. No.</p> <p>15 <b>Q. You don't know?</b></p> <p>16 A. I don't believe she is.</p> <p>17 <b>Q. What about Rachel Stuver, do you know what her</b></p> <p>18 <b>title is?</b></p> <p>19 A. She was an LPN when she was with Corizon.</p> <p>20 <b>Q. Okay. And do you know whether she's still</b></p> <p>21 <b>employed with Corizon?</b></p> <p>22 A. I don't believe she is, no.</p> <p>23 <b>Q. Who is Carol Holloway?</b></p> <p>24 A. She was an LPN.</p> <p>25 <b>Q. And is she -- do you know whether she's still</b></p>

10 (Pages 37 to 40)

Page 41	Page 43
<p>1 employed with Corizon?</p> <p>2 A. She is not.</p> <p>3 Q. How about Rachel Rempel?</p> <p>4 A. She is an RN.</p> <p>5 Q. Do you know if she's still employed with</p> <p>6 Corizon?</p> <p>7 A. Yes, she is.</p> <p>8 Q. What about Tabitha Johnson?</p> <p>9 A. She is an LPN.</p> <p>10 Q. Is she still employed?</p> <p>11 A. Yes.</p> <p>12 Q. What about Teresa Hamilton?</p> <p>13 A. She was an LPN and then she is an RN now.</p> <p>14 Q. Is she still employed with Corizon?</p> <p>15 A. Yes. Yeah, I believe so, as a PRN.</p> <p>16 Q. What about Shannon Burris?</p> <p>17 A. She was an LPN.</p> <p>18 Q. Still employed?</p> <p>19 A. No.</p> <p>20 Q. What about Brandy Baker?</p> <p>21 A. She was an LPN.</p> <p>22 Q. Is she still employed?</p> <p>23 A. No.</p> <p>24 Q. No?</p> <p>25 A. No.</p>	<p>1 Q. What about Megan Rex?</p> <p>2 A. Dental assistant.</p> <p>3 Q. Is Megan Rex still employed with Corizon?</p> <p>4 A. No.</p> <p>5 Q. What about Jessica Frizzell?</p> <p>6 A. I believe so.</p> <p>7 Q. Do you know Jerry Lovelace?</p> <p>8 MS. JAG: Can you all hear me?</p> <p>9 MR. NUGENT: Yes.</p> <p>10 MS. JAG: The hotspot just dropped the</p> <p>11 computer internet.</p> <p>12 MR. VIDEOGRAPHER: Do we want to go off the</p> <p>13 record and see if we can fix that real quickly?</p> <p>14 MR. NUGENT: Yes.</p> <p>15 MR. VIDEOGRAPHER: We're going off the</p> <p>16 record. The time is 10:04 a.m.</p> <p>17 (Off the record.)</p> <p>18 _____</p> <p>19 (Back on the record.)</p> <p>20 MR. VIDEOGRAPHER: We are back on the</p> <p>21 record. The time is 10:06 a.m.</p> <p>22 Q. (By Mr. Nugent) Ms. Christopher, we just had a</p> <p>23 brief technical difficulty. I believe the internet</p> <p>24 connection that you were on dropped. Can you hear</p> <p>25 me okay?</p>
Page 42	Page 44
<p>1 Q. Then if you see the first name on here, on</p> <p>2 this page, it's Sterling Ream, December 9 of 2017.</p> <p>3 Do you know what her title was in December of 2017?</p> <p>4 A. RN.</p> <p>5 Q. And we know she is still employed; is that</p> <p>6 right?</p> <p>7 A. Yes.</p> <p>8 Q. Do you know Lori Switzer's title?</p> <p>9 A. LPN.</p> <p>10 Q. In April of 2018, was she an LPN?</p> <p>11 A. Yes.</p> <p>12 Q. Is she still employed?</p> <p>13 A. Yes.</p> <p>14 Q. Do you know who Brandon Doss is?</p> <p>15 A. I believe he is a correctional officer.</p> <p>16 Q. Okay. Do you know Jessica Frizzell?</p> <p>17 A. Yes.</p> <p>18 Q. What was her title in January of 2019?</p> <p>19 A. Dental assistant, I believe.</p> <p>20 Q. Dental assistant?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Any reason why a dental assistant would</p> <p>23 access the face sheet of Terri LaBlance in January</p> <p>24 2019?</p> <p>25 A. No.</p>	<p>1 A. Yes.</p> <p>2 Q. All right. I'll just remind you to stay close</p> <p>3 to the computer so that the court reporter can hear</p> <p>4 you.</p> <p>5 A. Okay.</p> <p>6 Q. I believe the last name I left off with was</p> <p>7 Megan Rex and Jessica Frizzell. Are both of those</p> <p>8 individuals dental assistants?</p> <p>9 A. Yes, they were.</p> <p>10 Q. And are both of those individuals still</p> <p>11 working for Corizon?</p> <p>12 A. Megan Rex does not anymore. And I believe</p> <p>13 Jessica Frizzell still does.</p> <p>14 Q. Okay. Right as we had to take that quick</p> <p>15 break, I asked you if you knew Jerry Lovelace.</p> <p>16 A. Yeah. He is a -- he is a medical director</p> <p>17 physician.</p> <p>18 Q. And do you know what someone can see if they</p> <p>19 click on the outside information list page?</p> <p>20 MR. VIDEOGRAPHER: We're going off the</p> <p>21 record. The time is 10:08 a.m.</p> <p>22 (Break in proceedings.)</p> <p>23 MR. VIDEOGRAPHER: We're back on the record.</p> <p>24 The time is 10:09 a.m.</p> <p>25 Q. (By Mr. Nugent) We're going to get through</p>

11 (Pages 41 to 44)

<p style="text-align: right;">Page 45</p> <p>1 this one way or another here, so just bear with me.  2 I'm going to try to get through this as quickly as  3 possible.  4 I was asking you about -- if you look here on  5 Exhibit 43 where Jerry Lovelace's entry is on  6 February 11, 2019. Have you looked at someone's  7 outside information list page before? You're muted.  8 A. I'm muted? Can you hear me?  9 Q. Yes. Were you able to hear the last question,  10 Ms. Christopher?  11 MR. NUGENT: I still think we're having  12 technical difficulties.  13 MR. VIDEOGRAPHER: Going off the record.  14 The time is 10:11 a.m.  15 (Break in proceedings.)  16 MR. VIDEOGRAPHER: We are back on the  17 record. The time is 10:16 a.m.  18 Q. (By Mr. Nugent) Ms. Christopher, can you hear  19 me okay?  20 A. Yes.  21 Q. All right. Great. I need to bring this  22 document back up really quick. Do you see Exhibit  23 43 in front of you?  24 A. Yes.  25 Q. I want to draw your attention to the entry</p>	<p style="text-align: right;">Page 47</p> <p>1 Q. Do you know if she's still employed with  2 Corizon?  3 A. Yes, she is.  4 Q. And then what is Deborah Ritter's title?  5 A. LPN.  6 Q. Is she still employed?  7 A. I don't believe so.  8 Q. I want to ask you about a few of the screens  9 that are in the MOCIS software. Okay?  10 A. Okay.  11 Q. To the best of your recollection, what would  12 you see if you were to log on to a patient's  13 appointments list page?  14 A. Normally, I believe -- I'm trying to visualize  15 it -- you would see -- well, you have to search a  16 specific date range to see the appointments that  17 would be listed during that range. And then it  18 would say date and time, I think. And then you  19 would have to click to go in to what the appointment  20 was for, but it might say who it was for off to the  21 side. It's hard to visualize it without it being in  22 front of me, but that's --  23 Q. That's fair. I understand.  24 Would you consider the information on the  25 appointments list page as HIPAA information?</p>
<p style="text-align: right;">Page 46</p> <p>1 where Jerry Lovelace is here, February 11, 2019.  2 What I'm asking is, first, have you looked at  3 someone's outside information list page within the  4 MOCIS software?  5 A. Per patient, yes.  6 Q. Okay. And can you describe what information  7 is on the outside information list page?  8 A. On the list page, it would just probably be a  9 series of dates and maybe -- that's where, like, lab  10 results are found, X-ray results. If we had outside  11 records from another hospital or something scanned  12 in, that's where they would be listed.  13 Q. Okay. Let me ask a different question.  14 If you went to the outside information list  15 page, would you be able to see if anyone else  16 accessed the record on that screen here? Do you  17 know?  18 A. If I went to the outside information list  19 page, would I be able to tell if anybody else had  20 went on it?  21 Q. Yeah, if anyone had looked at this record.  22 A. I don't believe so.  23 Q. Okay. Do you know Judy Harkins' title?  24 A. She was lab tech. And then now she's a file  25 clerk.</p>	<p style="text-align: right;">Page 48</p> <p>1 MR. MATULA: Object to the form of the  2 question. Legal conclusion. Go ahead.  3 A. Well, we make appointment, like, dockets that  4 tell the offenders when to come over for  5 appointments that don't have any medical information  6 on them, just where to be and when. But if you go  7 into it, then it would say what the person is being  8 seen for. So you could access the HIPAA information  9 through it.  10 Q. Okay. So is that a yes?  11 A. Tell me the question one more time.  12 Q. Yeah. And I'm going to ask you a few lead-ups  13 to the question, so let's just sort of break that  14 down here. You have been a medical professional for  15 how long?  16 A. Since 2006.  17 Q. All right. And you have been educated on what  18 HIPAA is, right?  19 A. Yes.  20 Q. In addition to the education you've received,  21 you've also been trained by Corizon on what HIPAA  22 means?  23 A. Yes.  24 Q. In addition to your education and your  25 training, would you also say that you have a working</p>

12 (Pages 45 to 48)



<p style="text-align: right;">Page 49</p> <p>1 understanding of what information is protected by</p> <p>2 HIPAA?</p> <p>3 A. Yes.</p> <p>4 Q. All right. So as it pertains to the</p> <p>5 information listed on the appointment list page, I</p> <p>6 believe that you were describing that that's where</p> <p>7 individuals' appointments are listed; is that right?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And if all you can see are the</p> <p>10 appointments for a patient, the question to you is,</p> <p>11 would you consider that to be information protected</p> <p>12 by HIPAA?</p> <p>13 A. Yes, if it's -- if you're not involved in</p> <p>14 their care, yeah.</p> <p>15 Q. I'm going to ask you that same question as to</p> <p>16 whether the information on a number of these list</p> <p>17 pages within the MOCIS software is information that</p> <p>18 you would consider to be protected by HIPAA. Okay?</p> <p>19 A. Yes.</p> <p>20 Q. The information listed on the lab X-ray order</p> <p>21 list page?</p> <p>22 A. Yes.</p> <p>23 Q. The offender medical summary page?</p> <p>24 A. Yes.</p> <p>25 Q. Offender military service details page?</p>	<p style="text-align: right;">Page 51</p> <p>1 A. It could, yes.</p> <p>2 Q. What about the mental -- I'm sorry, let me</p> <p>3 start over. What about the medical mental health</p> <p>4 service request list page?</p> <p>5 A. Yes.</p> <p>6 Q. And lastly the provider diagnosis list page?</p> <p>7 A. Yes.</p> <p>8 Q. I'm going to recap just briefly,</p> <p>9 Ms. Christopher. There was one which you did not</p> <p>10 know and that was the offender military service</p> <p>11 details page, correct?</p> <p>12 A. Yes.</p> <p>13 Q. However, all of the others that I listed off</p> <p>14 and you were answering yes to, it's your testimony</p> <p>15 that those pages within the MOCIS software would</p> <p>16 contain information that you would consider</p> <p>17 protected by HIPAA?</p> <p>18 A. Yes, to the best of my knowledge.</p> <p>19 Q. I want to pick back up with your</p> <p>20 discussion that -- or your testimony -- excuse me --</p> <p>21 that individuals prior to you leaving in September</p> <p>22 2017 knew of Ms. LaBlance's record. After reviewing</p> <p>23 any of the names over the last 30 minutes or so, do</p> <p>24 you recall conversations between yourself and any of</p> <p>25 those individuals about Ms. LaBlance and her</p>
<p style="text-align: right;">Page 50</p> <p>1 A. I don't know what that page consists of. I</p> <p>2 don't think I've ever seen it.</p> <p>3 Q. So it sounds like your answer is, you don't</p> <p>4 know one way or the other if the information on that</p> <p>5 page is --</p> <p>6 A. I don't know what information it contains, no.</p> <p>7 Q. Provider diagnosis list page?</p> <p>8 A. Yes.</p> <p>9 Q. Vital sign list page?</p> <p>10 A. Yes.</p> <p>11 Q. Outside information list page?</p> <p>12 A. Yes.</p> <p>13 Q. Physicals list page?</p> <p>14 A. Yes.</p> <p>15 Q. Allergy information list page?</p> <p>16 A. Yes.</p> <p>17 Q. Charting guide list page?</p> <p>18 A. Yes.</p> <p>19 Q. And I think we've covered that one already. I</p> <p>20 apologize. What about the medication order list</p> <p>21 page?</p> <p>22 A. Yes.</p> <p>23 Q. What about the treatment plan list page?</p> <p>24 A. Yes.</p> <p>25 Q. What about the lay-in restriction list page?</p>	<p style="text-align: right;">Page 52</p> <p>1 Department of Correction records?</p> <p>2 A. Specific conversations, no, but I remember</p> <p>3 becoming aware that they said she had a record. So</p> <p>4 I don't remember specific conversations from that</p> <p>5 far back.</p> <p>6 Q. Understood. Do you remember who you were</p> <p>7 referring to when you say "they"?</p> <p>8 A. Not specifically. Probably the nurses I</p> <p>9 worked with on evening shift at that time, but I</p> <p>10 can't say specifically, without a doubt.</p> <p>11 Q. Do you recall whether or not anyone mentioned</p> <p>12 looking at Ms. LaBlance's medical records prior to</p> <p>13 you leaving in 2017?</p> <p>14 A. I don't recall.</p> <p>15 Q. What's the procedure for -- let me ask it this</p> <p>16 way. If someone accesses an individual's medical</p> <p>17 records and that person is not treating the</p> <p>18 individual with the medical records, is that person</p> <p>19 supposed to self-report their accessing of the</p> <p>20 medical record?</p> <p>21 A. Can you repeat the question?</p> <p>22 Q. Yeah. It's a terrible question.</p> <p>23 Here's what I'm trying to figure out. If you</p> <p>24 access someone's record who's not your patient, are</p> <p>25 you responsible for self-reporting that you accessed</p>

13 (Pages 49 to 52)



<p style="text-align: right;">Page 53</p> <p>1     <b>their medical record?</b></p> <p>2             MR. MATULA: Object to the form of the</p> <p>3     question. Vague.</p> <p>4             <b>Q. (By Mr. Nugent) Do you understand the</b></p> <p>5     <b>question, Ms. Christopher?</b></p> <p>6             A. I do. If you're aware of a HIPAA violation,</p> <p>7     you're supposed to report it.</p> <p>8             <b>Q. Okay. And if you're aware of that HIPAA</b></p> <p>9     <b>violation and you are the person who committed the</b></p> <p>10    <b>violation, are you supposed to report yourself?</b></p> <p>11            A. I would believe so.</p> <p>12            <b>Q. Did you report yourself because of your</b></p> <p>13    <b>accessing of Ms. LaBlance's records to anyone?</b></p> <p>14            A. Not at the time, but when I received my</p> <p>15    write-up, I did admit to it. I didn't deny it.</p> <p>16            <b>Q. Okay. If you know of someone who has accessed</b></p> <p>17    <b>someone's medical record, is it also your</b></p> <p>18    <b>responsibility to report that person?</b></p> <p>19            MR. MATULA: Object to the form of the</p> <p>20    question.</p> <p>21            <b>Q. (By Mr. Nugent) You can answer.</b></p> <p>22            A. Yes.</p> <p>23            <b>Q. All right. So let's use a specific example.</b></p> <p>24    <b>If you had known that Ms. Epperson or Ms. Kirby had</b></p> <p>25    <b>accessed Ms. LaBlance's medical information, in that</b></p>	<p style="text-align: right;">Page 55</p> <p>1             <b>Q. Prior to yesterday, had you seen the document</b></p> <p>2     <b>before?</b></p> <p>3             A. No.</p> <p>4             <b>Q. When you accessed Ms. LaBlance's medical</b></p> <p>5     <b>record, was there anyone that was looking at your</b></p> <p>6     <b>computer screen when you did it?</b></p> <p>7             A. No, I don't believe so.</p> <p>8             <b>Q. Okay. You mentioned that someone from Corizon</b></p> <p>9     <b>talked to you about accessing Ms. LaBlance's record</b></p> <p>10    <b>and you didn't deny it. Who was it from Corizon</b></p> <p>11    <b>that talked to you about accessing Ms. LaBlance's</b></p> <p>12    <b>record?</b></p> <p>13            A. Initially, I believe Rhonda Almanza had told</p> <p>14    us that people had, including Sterling and I. My</p> <p>15    write-up came from Jenny and Sterling as my</p> <p>16    supervisors.</p> <p>17            <b>Q. Would you repeat those names, Ms. Christopher?</b></p> <p>18            A. My write-u[ -- the first -- Rhonda Almanza,</p> <p>19    the one that I first -- Rhonda Almanza is the first</p> <p>20    one that mentioned it. My write-up came from Jenny</p> <p>21    Meehan and Sterling Ream as my supervisors.</p> <p>22            <b>Q. Do you know how to spell Rhonda's name,</b></p> <p>23    <b>please?</b></p> <p>24            A. Rhonda? I think it's R-H-O-N-D-A. And I</p> <p>25    think her last name is A-L-M -- hang on --</p>
<p style="text-align: right;">Page 54</p> <p>1     <b>scenario would it be your obligation to report it?</b></p> <p>2             MR. MATULA: Object to the form of the</p> <p>3     question.</p> <p>4             <b>Q. (By Mr. Nugent) You can answer.</b></p> <p>5             A. Yeah, I would have to make sure my supervisor</p> <p>6     was aware.</p> <p>7             <b>Q. Have you ever made a report of someone</b></p> <p>8     <b>accessing medical records for -- let me start over.</b></p> <p>9             Have you ever reported the inappropriate</p> <p>10    accessing of a medical record?</p> <p>11            A. Not that I recall.</p> <p>12            <b>Q. Are you aware of any reports like that made</b></p> <p>13    <b>during your employment at Corizon?</b></p> <p>14            A. I mean, aside from the paper that you showed</p> <p>15    me, no.</p> <p>16            <b>Q. Is the paper that you're referring to the</b></p> <p>17    <b>Exhibit 43 we've been looking at?</b></p> <p>18            A. Yes.</p> <p>19            <b>Q. Okay. Had you seen Exhibit 43 before?</b></p> <p>20            MR. MATULA: Object to the form of the</p> <p>21    question. Vague. Before what?</p> <p>22            <b>Q. (By Mr. Nugent) Before today.</b></p> <p>23            A. I saw it yesterday or something similar. I</p> <p>24    can't say it's the exact same thing, but it was</p> <p>25    similar if it wasn't the same.</p>	<p style="text-align: right;">Page 56</p> <p>1     A-L-M-O-N-Z-A.</p> <p>2             <b>Q. Rhonda Almanza. Thank you. Outside of Rhonda</b></p> <p>3     <b>Almanza and Jenny Meehan, I think there was a third</b></p> <p>4     <b>name. Can you remind me of who that was?</b></p> <p>5             A. Sterling Ream.</p> <p>6             <b>Q. So Sterling Ream sat in on your reprimand?</b></p> <p>7             A. She was my immediate supervisor, yes.</p> <p>8             <b>Q. Do you know whether or not Ms. Ream was</b></p> <p>9     <b>reprimanded for the same thing?</b></p> <p>10            A. She was.</p> <p>11            <b>Q. Okay. Outside of those three names, was there</b></p> <p>12    <b>anyone else from Corizon who had a conversation with</b></p> <p>13    <b>you about your accessing of Ms. LaBlance's records?</b></p> <p>14            A. Makisa -- I believe Makisa from HR was also</p> <p>15    present that day. I don't remember what she said,</p> <p>16    but she was present.</p> <p>17            <b>Q. When did you first learn that you were being</b></p> <p>18    <b>reprimanded?</b></p> <p>19            A. That day. That morning, I believe.</p> <p>20            <b>Q. Prior to the day that you were reprimanded,</b></p> <p>21    <b>did you have any conversations with anyone at</b></p> <p>22    <b>Corizon about your accessing Ms. LaBlance's record?</b></p> <p>23            A. Not that I recall.</p> <p>24            <b>Q. Okay. During the conversation in which you</b></p> <p>25    <b>were reprimanded, did anyone ask you why you</b></p>

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<p style="text-align: right;">Page 57</p> <p>1 accessed Ms. LaBlance's record?</p> <p>2 A. I don't recall. I probably told them what</p> <p>3 happened before they had a chance.</p> <p>4 Q. I'll just ask you now. Why did you access</p> <p>5 Ms. LaBlance's record?</p> <p>6 A. I don't know, honestly. I guess -- I really</p> <p>7 can't tell you exactly why. They gave me the</p> <p>8 number, said, "Look it up." And I did. I guess</p> <p>9 maybe curiosity. I didn't go any further into it,</p> <p>10 though. But I understand now that that was wrong.</p> <p>11 Q. So I think if I understand you right, the</p> <p>12 reason why you accessed Ms. LaBlance's record was</p> <p>13 curiosity?</p> <p>14 A. Yeah. I mean, it wasn't -- I can't think of</p> <p>15 any other word to describe it.</p> <p>16 Q. Okay. What were you curious about?</p> <p>17 A. I really don't know. I guess just what they</p> <p>18 were talking about. I'm not sure.</p> <p>19 Q. And when you say "they," who is they?</p> <p>20 A. Epperson and Kirby.</p> <p>21 Q. Were you aware that Ms. LaBlance made a</p> <p>22 complaint of discrimination in relation to her</p> <p>23 interactions with a lab tech?</p> <p>24 A. No, not at the time. I didn't know when that</p> <p>25 was, but I don't believe I was in a manager position</p>	<p style="text-align: right;">Page 59</p> <p>1 closing on it. I don't know if you're at a breaking</p> <p>2 spot or want to just kind of keep going to knock it out</p> <p>3 since we're running behind or what your thoughts are.</p> <p>4 MR. NUGENT: I was hoping to keep going and</p> <p>5 knock it out because of the unplanned breaks we've had.</p> <p>6 I believe I should be done right at 11, plus or minus</p> <p>7 five minutes.</p> <p>8 MR. MATULA: Tammie, are you comfortable</p> <p>9 with that? We've been going for a while, but we haven't</p> <p>10 had a chance to get up.</p> <p>11 THE WITNESS: Yes.</p> <p>12 MR. MATULA: Okay. As long as you're</p> <p>13 comfortable.</p> <p>14 Q. (By Mr. Nugent) Ms. Christopher, when you were</p> <p>15 the director of nursing, what were your hours?</p> <p>16 A. Usually 8 to 4:30. It would vary some</p> <p>17 depending on what was going on.</p> <p>18 Q. And when you say "vary some," does that mean</p> <p>19 you would start earlier or work later?</p> <p>20 A. Either, depending on what was going on.</p> <p>21 Q. Okay. Ms. Christopher, have you looked up any</p> <p>22 medical information for any other non-patients</p> <p>23 besides Ms. LaBlance?</p> <p>24 A. Not intentionally. Occasionally an offender</p> <p>25 will write a number on a HSR and I'll type it in and</p>
<p style="text-align: right;">Page 58</p> <p>1 then. I don't know that I even was there.</p> <p>2 Q. Okay. Are you aware of that complaint made by</p> <p>3 Ms. LaBlance as we sit here today?</p> <p>4 A. Vaguely.</p> <p>5 Q. Do you know how you became aware of that</p> <p>6 complaint by Ms. LaBlance?</p> <p>7 A. I can't remember when I became aware of it,</p> <p>8 honestly. I would say it was when I was in</p> <p>9 management.</p> <p>10 Q. Okay. So I understand you don't know the</p> <p>11 when, but do you know the how, how you became aware</p> <p>12 of Ms. LaBlance's complaint?</p> <p>13 A. I would assume Sterling told me. I think it</p> <p>14 was something related to Judy with another employee</p> <p>15 and just discussing Judy's attitude towards people</p> <p>16 in general.</p> <p>17 Q. And when you say Judy, are you referring to</p> <p>18 Judy Harkins?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And Judy Harkins is one of the</p> <p>21 individuals who was on Exhibit 43. Do you remember</p> <p>22 that?</p> <p>23 A. Yes.</p> <p>24 MR. MATULA: Ivan, I know we've had some</p> <p>25 breaks in here, but we're about two hours-ish, I guess</p>	<p style="text-align: right;">Page 60</p> <p>1 it'll pop up. And as soon as I realize it's not the</p> <p>2 right person, I'll put in another one or, you know,</p> <p>3 ask them to clarify their number. Usually it's a</p> <p>4 handwriting issue or just I get my numbers</p> <p>5 transposed.</p> <p>6 Q. Okay. Have you ever looked up any other</p> <p>7 records with the same curiosity that you had for</p> <p>8 Ms. LaBlance's record?</p> <p>9 A. Not that I recall.</p> <p>10 Q. Did anyone from Corizon explain to you why you</p> <p>11 were not being terminated?</p> <p>12 A. They didn't explain to me why not. They</p> <p>13 explained to me why I was being written up and</p> <p>14 having corrective action.</p> <p>15 Q. Are you aware that Ms. Kirby and Dr. Epperson</p> <p>16 were terminated?</p> <p>17 A. Yes.</p> <p>18 Q. Do you know why they were terminated?</p> <p>19 A. I didn't see any documentation from why, but I</p> <p>20 believe that it was because they went -- they dug</p> <p>21 around deeper in the medical record. But I can't</p> <p>22 speak for sure to that because I wasn't part of</p> <p>23 their termination process.</p> <p>24 Q. On February 7th of 2019, was that the first</p> <p>25 time you viewed any of Ms. LaBlance's Department of</p>

15 (Pages 57 to 60)

<p style="text-align: right;">Page 61</p> <p>1 <b>Corrections records?</b></p> <p>2 A. To the best of my recollection, yes.</p> <p>3 <b>Q. Was that the last time you viewed</b></p> <p>4 <b>Ms. LaBlance's Department of Corrections medical</b></p> <p>5 <b>records?</b></p> <p>6 A. I believe so.</p> <p>7 <b>Q. Are you part of the team that hires nurse</b></p> <p>8 <b>practitioners?</b></p> <p>9 A. No.</p> <p>10 <b>Q. Are you a part of the team that hires</b></p> <p>11 <b>registered nurses?</b></p> <p>12 A. I was, when I was director of nursing.</p> <p>13 <b>Q. Okay. I appreciate that clarification.</b></p> <p>14 <b>Just to make the record clear, while you were</b></p> <p>15 <b>the director of nursing, were you responsible for</b></p> <p>16 <b>hiring registered nurses?</b></p> <p>17 A. Registered nurses, yes.</p> <p>18 <b>Q. While you were the director of nursing, were</b></p> <p>19 <b>you responsible for hiring LPN nurses?</b></p> <p>20 A. Yes. I wasn't the only one, but I would be in</p> <p>21 on the interviews.</p> <p>22 <b>Q. Okay. During the process of hiring nurses,</b></p> <p>23 <b>does everyone go through a background check?</b></p> <p>24 A. I believe the Department of Corrections does</p> <p>25 one on everyone.</p>	<p style="text-align: right;">Page 63</p> <p>1 I signed it. It looks like it was the 25th.</p> <p>2 <b>Q. So you received this reprimand on March 25th;</b></p> <p>3 <b>is that accurate?</b></p> <p>4 A. Yes.</p> <p>5 MR. MATULA: Ivan, can you widen it out just</p> <p>6 a little bit to capture all the text on the right side?</p> <p>7 MR. NUGENT: If I go that far, Mike, I'm not</p> <p>8 sure if you can see it, but I'll certainly ask.</p> <p>9 <b>Q. (By Mr. Nugent) Ms. Christopher, can you see</b></p> <p>10 <b>the entire document?</b></p> <p>11 A. I can see the whole thing. I can't read it,</p> <p>12 though, the text.</p> <p>13 <b>Q. Okay. So I'm going to zoom back in and go</b></p> <p>14 <b>over it in parts because I understand you can't see</b></p> <p>15 <b>the wording. But to confirm, I was asking -- you</b></p> <p>16 <b>received this on March 25th; is that accurate?</b></p> <p>17 A. Yes.</p> <p>18 <b>Q. Ms. Christopher, I want to point your</b></p> <p>19 <b>attention to the Details of Current Incident</b></p> <p>20 <b>paragraph. Do you see that?</b></p> <p>21 A. Yes.</p> <p>22 <b>Q. And I'm going to read the second sentence. It</b></p> <p>23 <b>says, "The HIPAA privacy rule generally requires</b></p> <p>24 <b>Corizon Health to take reasonable steps to limit the</b></p> <p>25 <b>use and disclosure of PHI." What is PHI?</b></p>
<p style="text-align: right;">Page 62</p> <p>1 <b>Q. When you were hired as the director of</b></p> <p>2 <b>nursing, did that come with an increase in pay from</b></p> <p>3 <b>your staff nursing position?</b></p> <p>4 A. Yes.</p> <p>5 <b>Q. I've got another document I want to show you,</b></p> <p>6 <b>Ms. Christopher.</b></p> <p>7 A. Okay.</p> <p>8 <b>Q. All right. Do you see a document titled</b></p> <p>9 <b>Corrective Action Form?</b></p> <p>10 A. Yes.</p> <p>11 <b>Q. At the bottom I have premarked it as</b></p> <p>12 <b>Deposition Exhibit 45. It's Bates-labeled Corizon</b></p> <p>13 <b>1005.</b></p> <p>14 A. Yes.</p> <p>15 <b>Q. I'll zoom in so we can sort of talk about it</b></p> <p>16 <b>section by section here. Is that your name at the</b></p> <p>17 <b>top?</b></p> <p>18 A. Yes.</p> <p>19 <b>Q. At the beginning of your deposition, you</b></p> <p>20 <b>mentioned that you reviewed a few documents. Is</b></p> <p>21 <b>this one of the documents that you reviewed?</b></p> <p>22 A. Yes.</p> <p>23 <b>Q. And the date of March 24, 2019, is that the</b></p> <p>24 <b>date that you were reprimanded?</b></p> <p>25 A. I would have to see the bottom to see what day</p>	<p style="text-align: right;">Page 64</p> <p>1 A. Personal health information.</p> <p>2 <b>Q. "To the minimum amount necessary to accomplish</b></p> <p>3 <b>this purpose."</b></p> <p>4 <b>Have I read that correctly, Ms. Christopher?</b></p> <p>5 A. I believe so.</p> <p>6 <b>Q. Okay. Do you agree with that statement?</b></p> <p>7 A. Yes.</p> <p>8 <b>Q. Could you lean into the microphone?</b></p> <p>9 A. Yes. Sorry.</p> <p>10 <b>Q. The next sentence says, "Employees shall make</b></p> <p>11 <b>a reasonable effort to use and/or disclose only the</b></p> <p>12 <b>amount of personal health information which is</b></p> <p>13 <b>required to perform the essential job functions. By</b></p> <p>14 <b>accessing this patient's record for whom you were</b></p> <p>15 <b>not providing treatment, you violated the HIPAA</b></p> <p>16 <b>privacy rule."</b></p> <p>17 <b>What I'm wondering here, Ms. Christopher, is,</b></p> <p>18 <b>you mentioned that you were reprimanded for -- I'm</b></p> <p>19 <b>sorry -- that you were not terminated, but they told</b></p> <p>20 <b>you why you were reprimanded. Is it your opinion</b></p> <p>21 <b>that you have -- that you were reprimanded for</b></p> <p>22 <b>violating the HIPAA privacy rules?</b></p> <p>23 A. Yes.</p> <p>24 <b>Q. After your reprimand, were you required to do</b></p> <p>25 <b>anything else?</b></p>

16 (Pages 61 to 64)

<p style="text-align: right;">Page 65</p> <p>1 A. Yes. I had to complete HIPAA training on our 2 learning system, Corizon learning system. 3 <b>Q. Okay. Did you complete that training?</b> 4 A. I did. 5 <b>Q. Did you complete it by March 31 of 2019?</b> 6 A. I did. I don't remember what date it was, but 7 I know I did it before the deadline. 8 <b>Q. Do you know whether this Corrective Action</b> 9 <b>Form is still in your personnel file?</b> 10 A. I haven't looked at my personnel file, but I 11 wouldn't know why it wouldn't be. 12 <b>Q. One second, Ms. Christopher.</b> 13 A. Okay. 14 <b>Q. All right. Ms. Christopher, I have tried to</b> 15 <b>share another document with you. The first page of</b> 16 <b>it should be horizontal -- vertical on your screen.</b> 17 <b>If you turn it sideways, it's a photocopy of a</b> 18 <b>letter sent to Ms. LaBlance. Do you have a document</b> 19 <b>on your screen?</b> 20 A. Yes. 21 <b>Q. Okay. There also should be a 20, the number</b> 22 <b>20 in the bottom right-hand corner. Do you see</b> 23 <b>that?</b> 24 A. Yes. 25 <b>Q. All right. There are a number of pages here.</b></p>	<p style="text-align: right;">Page 67</p> <p>1 <b>Q. Why were you surprised?</b> 2 A. I just didn't know why anybody would do 3 something like that. 4 <b>Q. I've now moved to the next page in Exhibit 20.</b> 5 <b>It's LaBlance 3. Does this information also look</b> 6 <b>familiar with regards to the MOCIS system?</b> 7 A. I don't know where that was -- I haven't seen 8 that. There may be an additional information tab, 9 but I don't recall ever looking at it. You just 10 kind of -- we use the same ones over and over, it 11 seems like, and I don't really pay attention to the 12 ones that we don't use on a functional level. 13 <b>Q. Understood. Thank you. Ms. Christopher, I'm</b> 14 <b>going to take just a moment to look through my notes</b> 15 <b>and see if I have anything else. And also, let's</b> 16 <b>just take a five-minute bio break.</b> 17 MR. VIDEOGRAPHER: We are going off the 18 record. The time is 10:59 a.m. 19 (Off the record.) 20 _____ 21 (Back on the record.) 22 MR. VIDEOGRAPHER: We are back on the 23 record. The time is 11:10 a.m. 24 <b>Q. (By Mr. Nugent) Can you hear me okay,</b> 25 <b>Ms. Christopher?</b></p>
<p style="text-align: right;">Page 66</p> <p>1 <b>My first question is, if we look at what is</b> 2 <b>Bates-numbered LaBlance 2 -- I want you to ignore</b> 3 <b>the handwriting there, but is this what the face</b> 4 <b>sheet looks like?</b> 5 A. Can you zoom in a little bit? I believe it 6 is, but I just can't see it very well. Yes. 7 <b>Q. I'll represent to you that this was a part of</b> 8 <b>a number of documents mailed to Ms. LaBlance.</b> 9 <b>There's handwriting there that's Dr. Epperson's. My</b> 10 <b>question is, is this the -- when you accessed</b> 11 <b>Ms. LaBlance's face sheet, is the information that</b> 12 <b>appears here the information that you saw on your</b> 13 <b>computer screen?</b> 14 A. I would believe so. 15 <b>Q. Okay. Were you aware that Ms. Epperson sent a</b> 16 <b>number documents to Ms. LaBlance through the mail?</b> 17 A. I was not until later on. I believe the day 18 that I got the write-up is the day that I was told 19 about that, from what I remember. 20 <b>Q. Do you recall who told you that?</b> 21 A. I want to say it was Rhonda Almanza, but I'm 22 not sure. 23 <b>Q. All right. Were you surprised to learn that</b> 24 <b>Ms. Epperson had done that?</b> 25 A. Oh, yes.</p>	<p style="text-align: right;">Page 68</p> <p>1 A. Yes. 2 <b>Q. I'll just remind you, one, that you're under</b> 3 <b>oath and, two, to make sure you're staying close to</b> 4 <b>the microphone so that the court reporter can hear</b> 5 <b>you.</b> 6 <b>I want to finish up with a few questions.</b> 7 <b>First off, you accessed Ms. LaBlance's record in</b> 8 <b>early February, I believe, February 7th to be exact.</b> 9 <b>Are you aware that your husband, Mr. Christopher,</b> 10 <b>accessed Ms. LaBlance's records after you?</b> 11 A. Yes. He told me he got a write-up for that. 12 <b>Q. Okay. Did he tell you why he accessed the</b> 13 <b>record?</b> 14 A. Yes. 15 <b>Q. What was his response?</b> 16 A. He told me that Val Kirby came in his office 17 when he was working -- I think he was in Housing 18 Unit 1 -- and told him to look this up. He just 19 said "told me all about it." I don't know what she 20 told him, but that's how he found out. 21 <b>Q. Okay. Did he say when that happened?</b> 22 A. No. I don't remember. He may have told me at 23 the time, but I don't remember when it was. 24 <b>Q. Okay. I want to go back in time to 2017</b> 25 <b>before you left in, I believe, September. Did you</b></p>

17 (Pages 65 to 68)

<p style="text-align: right;">Page 69</p> <p>1 have any conversations with the nightshift staff</p> <p>2 that you felt like they shouldn't be having those</p> <p>3 conversations about Ms. LaBlance and her prior</p> <p>4 record at all? Did you say anything like that?</p> <p>5 A. I don't remember. I don't remember the</p> <p>6 specific conversations, so I'm not sure.</p> <p>7 Q. Did you have any concerns about the fact that</p> <p>8 your colleagues were talking about Ms. LaBlance's</p> <p>9 prior criminal record?</p> <p>10 A. I mean, obviously, I know that they shouldn't</p> <p>11 have been, but I didn't get the feeling that they</p> <p>12 were being malicious about it. It was just</p> <p>13 something they'd heard.</p> <p>14 Q. Okay. Did you know whether or not in 2017 if</p> <p>15 individuals had accessed Ms. LaBlance's medical</p> <p>16 records?</p> <p>17 A. I want to say I think I heard that some did</p> <p>18 access something. I don't know exactly what. But</p> <p>19 it's so long ago, I don't remember anything</p> <p>20 specifically.</p> <p>21 Q. And was their accessing of Ms. LaBlance's</p> <p>22 records in 2017 of any concern to you?</p> <p>23 MR. MATULA: Object to the form of the</p> <p>24 question. Go ahead.</p> <p>25 A. I just didn't give it a whole lot of thought,</p>	<p style="text-align: right;">Page 71</p> <p>1 Q. (By Mr. Nugent) Okay. Let me ask you this:</p> <p>2 When you access MOCIS, what's the first screen that</p> <p>3 pops up?</p> <p>4 A. The sign-in page.</p> <p>5 Q. After the sign-in page?</p> <p>6 A. I believe -- it's something I do so second</p> <p>7 nature -- I believe it is just a page where you can</p> <p>8 type in an offender number.</p> <p>9 Q. Sort of like a search page?</p> <p>10 A. Yes.</p> <p>11 Q. Let's say you type in an offender number and</p> <p>12 you hit enter, what is then the next page that you</p> <p>13 see?</p> <p>14 A. The face page, I believe.</p> <p>15 Q. Would you agree with me that accessing the</p> <p>16 medication order list page that Ms. Harkins did</p> <p>17 requires a step further than just putting in the</p> <p>18 offender number?</p> <p>19 A. Yes.</p> <p>20 Q. Ms. Christopher, are there any questions of</p> <p>21 mine that you would like to revisit?</p> <p>22 A. Not that I can think of.</p> <p>23 Q. Okay. Have you -- I take it that you've</p> <p>24 understood all of my questions today because you</p> <p>25 have not -- or if you did ask, we've covered them.</p>
<p style="text-align: right;">Page 70</p> <p>1 honestly. I was busy doing what I needed to do.</p> <p>2 Q. (By Mr. Nugent) Okay. Ms. Christopher,</p> <p>3 throughout this litigation, Corizon has informed me</p> <p>4 of who has been reprimanded as a result of accessing</p> <p>5 Ms. LaBlance's records. I can tell you that they've</p> <p>6 told me that you have been reprimanded, that</p> <p>7 Sterling Ream has been reprimanded, Tabitha Johnson,</p> <p>8 Deborah Ritter, and Jessica Frizzell. My question</p> <p>9 to you is, if I pull up Exhibit 43 that we were</p> <p>10 looking at earlier, as you can see, Judy Harkins was</p> <p>11 not reprimanded, but yet she accessed information</p> <p>12 protected by HIPAA. Does it concern you that you</p> <p>13 were reprimanded and Judy Harkins was not?</p> <p>14 MR. MATULA: Object to the form. Go ahead.</p> <p>15 A. I mean, I didn't know that she did. So I</p> <p>16 guess up until this point, it wasn't concerning</p> <p>17 because I don't believe I knew she did. I don't</p> <p>18 know why she wasn't and I was. I don't know.</p> <p>19 Q. (By Mr. Nugent) Okay. Well, I understand that</p> <p>20 you didn't know up until this point. Now that you</p> <p>21 know, does that cause you any concern?</p> <p>22 MR. MATULA: Objection, vague. Go ahead.</p> <p>23 A. I guess I'd have to have more detail into the</p> <p>24 reasons why from the people that made the decision</p> <p>25 before I could answer that.</p>	<p style="text-align: right;">Page 72</p> <p>1 A. I asked for clarification on anything that I</p> <p>2 didn't feel I understood, yeah.</p> <p>3 Q. Right. And then, lastly, have you told the</p> <p>4 truth today?</p> <p>5 A. Yes.</p> <p>6 MR. NUGENT: Thanks, Ms. Christopher. I</p> <p>7 have no further questions.</p> <p>8 THE WITNESS: Thank you, sir.</p> <p>9 MR. MATULA: Rachel?</p> <p>10 MS. JAG: I have no questions for</p> <p>11 Ms. Christopher. Thank you, though.</p> <p>12 MR. VIDEOGRAPHER: Is that it for everyone?</p> <p>13 No more questions?</p> <p>14 MS. JAG: Yes, sir. No further questions</p> <p>15 for the DOC.</p> <p>16 MR. MATULA: Correct. This is Mike Matula.</p> <p>17 No questions at this time. I will ask for the witness</p> <p>18 to read and sign and you can send that through me.</p> <p>19 MR. VIDEOGRAPHER: That concludes today's</p> <p>20 deposition of Tammie Christopher. We're going off the</p> <p>21 record. The time is 11:20 a.m.</p> <p>22 [The deposition was concluded at 11:20 a.m.]</p> <p>23</p> <p>24</p> <p>25</p>

**TAMMIE CHRISTOPHER 11/4/2020**

<p align="right"><b>Page 73</b></p> <p>1                    CERTIFICATE OF REPORTER</p> <p>2                    I, Joann Renee Richardson, CCR, for the State of</p> <p>3                    Missouri, do hereby certify that the deposition of</p> <p>4                    TAMMIE CHRISTOPHER was held on November 4, 2020, via</p> <p>5                    videoconference, State of Missouri, and was held on the</p> <p>6                    time and in the place previously described.</p> <p>7</p> <p>8                    IN WITNESS WHEREOF, I have hereunto set my hand</p> <p>9                    and seal.</p> <p>10</p> <p>11</p> <p>12                    _____</p> <p>13                    Joann Renee Richardson, CCR</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p align="right"><b>Page 75</b></p> <p>1                    ERRATA SHEET</p> <p>2                    Witness Name: TAMMIE CHRISTOPHER</p> <p>3                    Case Name: TERRI YOLANDA LABLANCE v. MISSOURI</p> <p>4                    DEPARTMENT OF CORRECTIONS AND CORIZON HEALTH</p> <p>5                    Date Taken: NOVEMBER 4, 2020</p> <p>6</p> <p>7                    Page # _____ Line # _____</p> <p>8                    Should read: _____</p> <p>9                    Reason for change: _____</p> <p>10</p> <p>11                    Page # _____ Line # _____</p> <p>12                    Should read: _____</p> <p>13                    Reason for change: _____</p> <p>14</p> <p>15                    Page # _____ Line # _____</p> <p>16                    Should read: _____</p> <p>17                    Reason for change: _____</p> <p>18</p> <p>19                    Page # _____ Line # _____</p> <p>20                    Should read: _____</p> <p>21                    Reason for change: _____</p> <p>22</p> <p>23                    Page # _____ Line # _____</p> <p>24                    Should read: _____</p> <p>25                    Reason for change: _____</p> <p>26                    Witness Signature: _____</p>
<p align="right"><b>Page 74</b></p> <p>1                    ALARIS LITIGATION SERVICES</p> <p>2                    November 20, 2020</p> <p>3                    Mr. Michael L. Matula</p> <p>4                    Ogletree Deakins</p> <p>5                    4520 Main Street, Suite 400</p> <p>6                    Kansas City, Missouri 64111</p> <p>7                    IN RE: TERRI YOLANDA LABLANCE v. MISSOURI</p> <p>8                    DEPARTMENT OF CORRECTIONS AND CORIZON HEALTH</p> <p>9                    Dear Mr. Matula,</p> <p>10                    Please find enclosed your copies of the deposition of</p> <p>11                    TAMMIE CHRISTOPHER taken on November 4, 2020 in the</p> <p>12                    above-referenced case. Also enclosed is the original</p> <p>13                    signature page and errata sheets.</p> <p>14                    Please have the witness read your copy of the</p> <p>15                    transcript, indicate any changes and/or corrections</p> <p>16                    desired on the errata sheets, and sign the signature</p> <p>17                    page before a notary public.</p> <p>18                    Please return the errata sheets and notarized</p> <p>19                    signature page within 30 days to our office at 711 N</p> <p>20                    11th Street, St. Louis, MO 63101 for filing.</p> <p>21                    Sincerely,</p> <p>22</p> <p>23                    Joann Renee Richardson</p> <p>24</p> <p>25</p>	<p align="right"><b>Page 76</b></p> <p>1                    STATE OF _____)</p> <p>2                    COUNTY OF _____)</p> <p>3</p> <p>4                    I, TAMMIE CHRISTOPHER, do hereby certify:</p> <p>5                    That I have read the foregoing deposition;</p> <p>6                    That I have made such changes in form</p> <p>7                    and/or substance to the within deposition as might</p> <p>8                    be necessary to render the same true and correct;</p> <p>9                    That having made such changes thereon, I</p> <p>10                    hereby subscribe my name to the deposition.</p> <p>11                    I declare under penalty of perjury that the</p> <p>12                    foregoing is true and correct.</p> <p>13                    Executed this _____ day of _____,</p> <p>14                    20____, at _____.</p> <p>15</p> <p>16</p> <p>17</p> <p>18                    _____</p> <p>19                    TAMMIE CHRISTOPHER</p> <p>20</p> <p>21                    _____</p> <p>22                    NOTARY PUBLIC</p> <p>23                    My Commission Expires:</p> <p>24                    100180</p> <p>25</p>

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**TAMMIE CHRISTOPHER 11/4/2020**

<b>A</b>	addition 9:16 48:20,24	46:19 67:2	<b>Auditing</b> 4:7 30:7	23:7,18,25
<b>A-L-M</b> 55:25	additional 9:13	anymore 44:12	<b>August</b> 13:6	24:4,22 25:2
<b>A-L-M-O-N-Z-A</b>	67:8	anyway 37:2	21:7	25:15 26:8
56:1	<b>address</b> 31:18	<b>apologize</b>	<b>aware</b> 52:3	28:19,21,23
<b>a.m</b> 2:10,10 5:10	<b>administrator</b>	50:20	53:6,8 54:6	28:25 29:4,12
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46:15,19	<b>agree</b> 8:18 64:6	47:13,16,25	<b>B</b> 4:5	46:22 47:7,14
<b>above-refere...</b>	71:15	48:5 49:7,10	<b>back</b> 7:11,12	49:6 53:11
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